

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Lester Jay Chambers

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Rowan University

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name
	Street Address
	County, City
	State & Zip Code
	Telephone Number

Lester C. Chambers  
15 Harrell Ave.  
Glooucester, Williamstown  
New Jersey 08094  
856-230-9218

RECEIVED

APR 13 2023

AT 8:30 \_\_\_\_\_ M  
CLERK, U.S. DISTRICT COURT - DNJ

**COMPLAINT**

Jury Trial:  Yes  No

(check one)

B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Rowan University  
 Street Address 201 Mullica Hill Rd.  
 County, City Gloucester, Glassboro  
 State & Zip Code New Jersey 08028

Defendant No. 2

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

A. What is the basis for federal court jurisdiction? (check all that apply)

Federal Questions  Diversity of Citizenship  
 U.S. Government Plaintiff  U.S. Government Defendant

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

Title VII of the Civil Rights Act of 1964 as amended

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Rowan University - Glassboro campus

B. What date and approximate time did the events giving rise to your claim(s) occur? 2012 To Present

**C. Facts:**

What happened to you?

Respondent hired me in September 1998 as a part time housekeeper. In 2012 Respondent promoted me to Locksmith. I am African American. Throughout the duration of my employment Respondent has made me endure harassment and unfair and discriminatory terms and conditions of employment and denied me training opportunities. When Respondent promoted me to locksmith it required me to work the night shift. In 2015 I reported to Respondent that there was racial discrimination in the workplace. After reporting the discrimination Respondent began retaliating against me. In January or February 2022 Respondent told me to perform plumbing related tasks. Respondent however does not make Caucasian Locksmith William Williams work the night shift or perform plumbing related tasks. In addition to this, while I have asked for overtime many times, Respondent has rejected my requests. Respondent nonetheless allows Mr. Williams to work overtime. While Respondent is aware of the racial discrimination I have experienced, it has not taken remedial action. I allege that Respondent discriminated against me due to my racial or ethnic background and retaliated against me for reporting racial discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended, by providing me with unfair and discriminatory terms and conditions of employment, harassing me and denying me training opportunities.

Who did what?

**Harassment:**

Ken Kersey, Former Vice President Employee-Labor Relations  
Henry Oh, Vice President Employee-Labor Relations  
Mike McGrail, Locksmith supervisor  
Kevin Muldoon, Senior Director of Facilities

**Denial of training opportunities:**

Kevin Muldoon, Senior Director of Facilities  
Mike McGrail, Locksmith supervisor

Was anyone else involved?

**Retaliation:**  
Ken Kersey, Former Vice President Employee-Labor Relations  
Henry Oh, Vice President Employee-Labor Relations  
Kevin Muldoon, Senior Director of Facilities  
Mike McGrail, Locksmith supervisor

**Unequal wages:**

Henry Oh, Vice President Employee-Labor Relations  
Kevin Muldoon, Senior Director of Facilities  
Mike McGrail, Locksmith supervisor

Who else saw what happened?

**Jeff Jennent: former 3<sup>rd</sup> shift supervisor**

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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Bac X. Nyguyen, MD, Mullica Hill, New Jersey  
treated me for Anxiety, Depression, Diabetes, Insomnia, Sleep disturbances

Daniel W. Altman, MD, Turnersville, New Jersey  
treated me High Blood Pressure

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

**Compensatory Damages** one million dollars (\$1,000,000) for violation of my civil rights rights under Title VII of the Civil Rights Act of 1964, as Amended, and, the New Jersey Law Against Discrimination (LAD)\*  
A "given discriminatory terms and conditions of employment"

B "subjected to harassment"

C "subjected to retaliation"

D "denied training opportunities"

E "given unequal wages due to his race"

F "given discriminatory terms and conditions of employment"

\* LAD, New Jersey Statutes Annotated, 10:5-1 et seq.

**Punitive Damages** three million dollars (\$3,000,000) for my endurance of Defendant's egregious and pervasive acts resulting in my pain and suffering including but not limited to  
A family disruption and divorce from the strain of pervasive work controversy

B decline of medical health

C physical and emotional stress

D Prolonged stress, according to the director of the Yale Interdisciplinary Stress Center," increases the risk of heart disease, addiction, mood disorders, and post-traumatic stress disorder...It can influence metabolism, accelerating obesity-related disorders such as diabetes. Stress also saps our ability to regulate emotions and to think clearly."\*

\* <https://news.yale.edu/2021/12/06/stress-makes-lifes-clock-tick-faster-chilling-out-slows-it-down>

In addition to monetary damages, I beg the Court to seek from the defendant a commitment [detailing] that future discrimination complaints, if any, will be addressed in a timely, judicious, and non-retaliatory manner.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 13<sup>th</sup> day of April, 2023.

Signature of Plaintiff Lee C  
Mailing Address 15 Harrell Ave  
Williamstown NJ  
08094  
Telephone Number (856) 230 - 9218  
Fax Number (if you have one) \_\_\_\_\_  
E-mail Address lillester@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Lee C